

EXHIBIT

5

01077-A1519989.pdf, 01095-A1519991.pdf, 01113-A1519993.pdf "list of employees who have been paid by virology sso codes since 2008 through april 2013" includes plaintiff's name pg 6.

01130-A1519994.pdf 1997 emails from plaintiff's supervisor re plaintiff trying to obtain cidofivir, getting vaccinated for smallpox, email use, home phone

11. For each PR-2016-00760 document listed above in #10, admit that the records contain information that is: a) personal; (b) confidential; (c) statutorily exempt from public inspection; (d) offensive; (e) frivolous; (f) routinely provided by the UW in response to public records requests; or (g) could have the effect of discrimination against the Plaintiff; or (h) it could be possible to determine the identity of persons receiving healthcare from these records.

12. Admit that the records contained in PR-2015-00570 and PR-2016-00760 are disorganized (not generally in order by date or type of document, contain multiple copies of some documents, and that some sequential documents are missing).

13. Admit that the Settlement Agreement at # 16 contains a non-disclosure clause.

14. Admit the description of each of the following documents contained in UW

PR-2016-00760:

stage 1

00020-A1496194.pdf, an email from human resources, part of one of the "drafts of memos recommending further discipline of Dalessio."

00026-A1496197.pdf, a Task List, part of one of the "drafts of memos recommending further discipline of Dalessio."

00219-A1510603.pdf April 5, 2002 letter from supervisor (Attachment 5 of July 12, 2002 letter recommending disciplinary action).

00232-A1510612.pdf (and another copy 00236-A1510615.pdf) letter from supervisor dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action).

00277-A1510643 (and 00489-A1510782.pdf) letter dated March 20, 2002 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

00287-A1510651.pdf AND 00289-A1510652.pdf (another copy) letter of counsel, dated April 4, 2002 (attachment 4 of July 12, 2002 letter recommending disciplinary action)

00299-A1510660.pdf, 00411-A1510733.pdf job description attachment A to letter

00362-A1510699.pdf notes from 10/16/02 meeting to recommend further discipline.

00399-A1510726.pdf letter of reprimand dated May 16, 2002 (attachment 7 of July 12, 2002 letter recommending disciplinary action)

00408-A1510731.pdf letter dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action)

00467-A1510766.pdf Letter dated March 20, 2001 (attachment 3 of July 12, 2002 letter recommending disciplinary action) .

00489-A1510782.pdf Letter dated March 20, 2002 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

00497-A1510789.pdf 2002 employee performance evaluation added to Plaintiff's personnel file, part of one of the "drafts of memos recommending further discipline of Dalessio".

PR-2016-00760 stage 2

00560-A1519744.pdf

pg 1-4 Letter of reprimand dated May 16, 2002 (attachment 7 of July 12, 2002 letter recommending disciplinary action).

pg 7-8 Letter dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action).

pg 9 Letter dated March 20, 2001 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

pg 10-11 Letter of counsel, dated April 4, 2002 (attachment 4 of July 12, 2002 letter recommending disciplinary action).

pg 12-13 Letter dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action).

pg 14 Letter dated March 20, 2001 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

pg 15-16 April 5, 2002 letter from supervisor (Attachment 5 of July 12, 2002 letter recommending disciplinary action).

pg 17-18 Letter of counsel, dated April 4, 2002 (attachment 4 of July 12, 2002 letter recommending disciplinary action).

pg 19-20 Letter dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action).

pg 21 Letter dated March 20, 2001 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 50-55 Letter of reprimand dated May 16, 2002 (attachment 7 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 56-57 Letter dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 58 Letter dated March 20, 2001 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 59-60 Letter of counsel, dated April 4, 2002 (attachment 4 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 61-62 Letter dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 63 Letter dated March 20, 2001 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 64-65 April 5, 2002 letter from supervisor (Attachment 5 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 66-67 Letter of counsel, dated April 4, 2002 (attachment 4 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 68-69 Letter dated Dec 7, 2001 (attachment 2 of July 12, 2002 letter recommending disciplinary action).

00782-A1519949.pdf pg 70 Letter dated March 20, 2001 (attachment 3 of July 12, 2002 letter recommending disciplinary action).

15. For each of the 37 documents listed above in #15, admit (a) that the UW agreed to remove the document from Plaintiff's "official Personnel Department file and from all Department of Laboratory Medicine files" according to the Settlement Agreement at #2; (b) that it is offensive.

16. Admit that the Settlement Agreement at # 7, (PR-2015-00570, stage 2, p129, #7: In part "This includes any action under the Age Discrimination in Employment Act and/